

LORI HARPER SUEK
Assistant U.S. Attorney
U.S. Attorney's Office
James F. Battin U.S. Courthouse
2601 Second Ave. North, Suite 3200
Billings, MT 59101
Phone: (406) 657-6101
FAX: (406) 657-6989
Email: Lori.Suek@usdoj.gov

FILED

APR 21 2022

Clerk, U S District Court
District Of Montana
Billings

gdt

**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**DARNELL LEE NOT AFRAID,
EARL LANDON OLD CHIEF JR.,
and DARWYNA CAYLYNN
BULLSHOWS,**

Defendants.

CR 22- *44* -BLG-*SPW*

INDICTMENT

**ASSAULT ON A FEDERAL OFFICER
(Counts I and III)**

**18 U.S.C. §§ 111(a)(1) and (b)
(Penalty: 20 years of imprisonment,
\$250,000 fine, and three years of
supervised release)**

**POSSESSION OF A FIREARM IN
FURTHERANCE OF A CRIME OF
VIOLENCE**

(Count II)

**Title 18 U.S.C. § 924(c)(1)(A)(i)
(Penalty: Mandatory minimum five years
up to life imprisonment, consecutive to
any other term of imprisonment, \$250,000
fine, and five years of supervised release)**

	ASSAULT ON A FEDERAL OFFICER (Count IV) 18 U.S.C. § 111(a)(1) (Penalty: Eight years of imprisonment, \$250,000 fine, and three years of supervised release) CRIMINAL FORFEITURE 18 U.S.C. § 924(d)
--	---

THE GRAND JURY CHARGES:

COUNT I

That on or about March 14, 2021, at Lodge Grass, in Big Horn County, in the State and District of Montana, the defendant, DARNELL LEE NOT AFRAID, forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a Bureau of Indian Affairs police officer, an officer employed by the United States Department of Interior, Bureau of Indian Affairs, and used a deadly and dangerous weapon, a firearm, while the officer was engaged in his official duties, in violation of 18 U.S.C. § 111(a)(1) and (b).

COUNT II

That on or about March 14, 2021, at Lodge Grass, in Big Horn County, in the State and District of Montana, the defendant, DARNELL LEE NOT AFRAID, knowingly possessed a firearm in furtherance of a crime of violence that may be

prosecuted in a court of the United States, namely the offense of assault on a federal officer alleged in Count I of this indictment, in violation of 18 U.S.C. § 924(c)(1)(A)(i).

COUNT III

That on or about March 14, 2021, at Lodge Grass, in Big Horn County, in the State and District of Montana, the defendant, EARL LANDON OLD CHIEF, JR., forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a Bureau of Indian Affairs police officer, an officer employed by the United States Department of Interior, Bureau of Indian Affairs, and used deadly and dangerous weapons, a Taser and a bottle, while the officer was engaged in his official duties, in violation of 18 U.S.C. § 111(a)(1) and (b).

COUNT IV

That on or about March 14, 2021, at Lodge Grass, in Big Horn County, in the State and District of Montana, the defendant, DARWYNA CAYLYNN BULLSHOWS, forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a Bureau of Indian Affairs police officer, an officer employed by the United States Department of Interior, Bureau of Indian Affairs, by slapping the officer in the face, in violation of 18 U.S.C. § 111(a)(1).

FORFEITURE ALLEGATION

Upon conviction of any offense set forth in Counts I and II of this indictment, the defendant, DARNELL LEE NOT AFRAID, shall forfeit, pursuant to 18 U.S.C. § 924(d), any firearms and ammunition involved in any knowing violation of said offense.

A TRUE BILL.

Foreperson signature redacted.
Original document filed under seal.

for 
LEIF M. JOHNSON
United States Attorney

for 
JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney